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PAGE 1 / 2

October 15, 2013

Ryan Furman
Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00237198

Reference: Year End Report (10/1/11-12/31/11)

Dear Mr. Furman:

This letter is in response to your request for additional information, dated September 9, 2013.

Your letter indicates that the Committee has disclosed contributions that appear to exceed the limits as set forth in the Act:

1. James Bitner: The Committee has refunded Mr. Bitner \$1000 on 10/15/13.
2. Gary Lytle: The 10/31/11 contribution came to the Committee through a joint fundraising committee and the excessive portion will therefore be transferred back to that committee for reallocation in accordance with the joint fundraising agreement.
3. John Sadner: The 10/31/11 contribution came to the Committee through a joint fundraising committee and the excessive portion will therefore be transferred back to that committee for reallocation in accordance with the joint fundraising agreement.
4. Caesars Entertainment PAC: The 10/31/11 contribution came to the Committee through a joint fundraising committee and the excessive portion will therefore be transferred back to that committee for reallocation in accordance with the joint fundraising agreement.
5. Dell Employee PAC: The Year End Report has been amended to accurately designate the 10/31/11 contribution to the 2012 General Election, as was indicated by the contributor.
6. Power PAC/Energy PAC: The Year End Report has been amended to accurately designate the 10/31/11 contributions from Energy PAC and Power PAC to the 2012 General as was indicated by the contributors.
7. American Staffing Association-StaffingPAC: The 12/31/11 contribution came to the Committee through a joint fundraising committee and it will therefore be transferred back to that committee for reallocation in accordance with the joint fundraising agreement.
8. CKE Restaurants PAC: The Year End Report has been amended to reflect this contribution as designated \$2500 Primary and \$2500 General.
9. Penn National Gaming PAC: These funds came through a joint fundraising committee. The Year End Report has been amended to reflect one contribution on 10/31/11 as designated \$2500 Primary and \$2500 General. The remaining funds will therefore be transferred back to that committee for reallocation in accordance with the joint fundraising agreement.
10. James Day; Vera Fernau; Daniel French; Margrit Hancher; Frances Harrell; Vail Miller; Ray Oden; Lunsford Richardson; Paul Schinkal and John Schwan: No additional action is required for these individuals.

Finally, by way of explanation, during 2011, the Committee recognized that its data base vendor was being overloaded by the volume of contributions. Many of the RFAs received in early 2011 were the result of donors who had contributed through a joint fundraising committee and not directly to the Committee. Thus, the committee transitioned to a new filing software and processing system vendor in October 2011. This system allows for closer monitoring of all receipts, as well as provides several quality assurance reports to track duplicate entries and excessive contributions. In addition, the current vendor now reviews all donor allocations prior to any distribution from a joint committee to
